

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION)	Master File No.: 12-md-02311 Honorable Marianne O. Battani
In Re: All Auto Parts Cases)	2:12-MD-02311-MOB-MKM
THIS DOCUMENT RELATES TO: ALL AUTO PARTS CASES)	Oral Argument Requested

**DECLARATION OF SCOTT M. ABELES IN SUPPORT OF
CERTAIN SSEs' OBJECTIONS TO THE SPECIAL MASTERS'S ORDERS
REGARDING THE PARTIES' MOTION TO COMPEL DISCOVERY FROM NON-
PARTY OEMS AND ORDERING NON-PARTY RULE 30(b)(6) DEPOSITIONS**

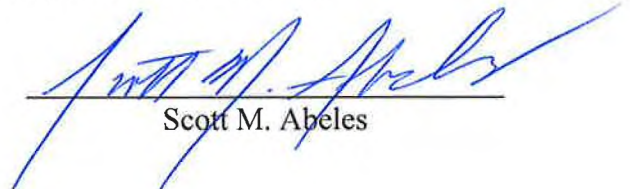
I, Scott M. Abeles, declare as follows:

I am an attorney at Proskauer Rose LLP, counsel for FCA US LLC and Fiat Chrysler Finance North America, Inc. I make this Declaration to place before the Court true and correct copies of the following exhibits in support of certain Specified Subpoenaed Entities' ("SSEs") Objections to the Special Master's Orders regarding discovery and non-party depositions:

Exhibits

1. The SSEs' [Proposed] Order Holding the Parties' Motion to Compel in Abeyance and Authorizing Rule 30(b)(6) Depositions of Certain SSEs on Limited Topics, submitted by the SSEs to the Special Master for consideration on April, 15, 2016.
2. April 15, 2016 cover email from S. Abeles (SSEs) to Special Master Esshaki setting forth bases for the SSEs' Proposed Orders.
3. March 2, 2016 email from G. Esshaki (Special Master) to SSEs and Parties.

Executed on May 4, 2016



Scott M. Abeles